

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

VIRTAMOVE, CORP.,  
Plaintiff,

V.

HEWLETT PACKARD ENTERPRISE  
COMPANY,  
Defendant.

VIRTAMOVE, CORP.,  
Plaintiff,

V.

INTERNATIONAL BUSINESS  
MACHINES  
CORP.,  
Defendant.

Case No. 2:24-cv-00093-JRG  
(Lead Case)

## JURY TRIAL DEMANDED

Case No. 2:24-CV-00064-JRG  
(Member Case)

## JURY TRIAL DEMANDED

**PLAINTIFF VIRTAMOVE, CORP.'S NOTICE OF SUBMISSION OF PROPOSED  
REDACTIONS TO SEALED IBM TRANSFER ORDER**

Pursuant to the Court's February 5, 2025 Sealed Memorandum Opinion and Order (Dkt. 129, the "Sealed Order"), the parties have conferred for the purpose of generating an appropriately redacted public version of the Sealed Order.

Plaintiff VirtaMove, Corp. ("VirtaMove") respectfully provides the redacted version of the Sealed Order attached as Exhibit A hereto, which merely removes the "sealed" notices and which otherwise leaves the content unsealed. Defendant International Business Machines Corporation ("IBM") does not oppose.

Dated: February 18, 2025

Respectfully submitted,

By: /s/ Reza Mirzaie

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**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that counsel met and conferred, and the relief requested herein is unopposed.

/s/ Qi (Peter) Tong  
Qi (Peter) Tong

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system pursuant to Local Rule CV-5(a)(3) on February 18, 2025.

/s/ Reza Mirzaie